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January 15, 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
Washington, D.C. 20554

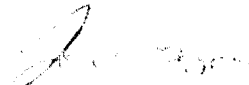
**Re: Amendment of Section 73.202(b) FM Table of  
Allotments (Ashdown and DeQueen, Arkansas)**

Dear Mr. Caton:

Transmitted herewith on behalf of Bunyard Partnership, the licensee of KARQ(FM) and Jay W. Bunyard and Anne W. Bunyard, the licensee of KDQN-FM, is an original and four copies of a petition seeking the institution of a rule making proceeding to substitute Channel 227C3 for Channel 221A at Ashdown, Arkansas and to substitute Channel 221C2 for Channel 226C2 at DeQueen, Arkansas. This petition is respectfully directed to the Chief, Allocations Branch.

Should any questions arise concerning this matter, please contact this office directly.

Sincerely,

  
John F. Garziglia

Enclosure

CHY  
MMB  
1/15/97

DEC 15 1992

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )  
 )  
Amendment of Section 73.202(b) ) RM \_\_\_\_\_  
Table of Allotments )  
FM Broadcast Stations )  
(Ashdown and DeQueen, Arkansas) )

To: Chief, Allocations Branch

**PETITION FOR RULE MAKING**

Bunyard Partnership, the licensee of KARQ(FM), Ashdown, Arkansas and Jay W. Bunyard and Anne W. Bunyard, the licensee of KDQN-FM, DeQueen, Arkansas, by their attorneys, pursuant to Section 1.401 of the Commission's rules, hereby seek the institution of a rule making proceeding seeking the substitution of Channel 227C3 for Channel 221A at Ashdown, Arkansas, and a modification of the license of KARQ(FM) to specify operation on Channel 227C3<sup>1/</sup>; and the substitution of Channel 221C2 for Channel 226C2 at DeQueen, Arkansas, and the modification of the license of KDQN-FM to specify operation on Channel 221C2<sup>2/</sup>.

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<sup>1/</sup> Channel 227C3 may be allotted to Ashdown, Arkansas at reference coordinates of 33° 40' 22" North Latitude, 94° 11' 02" West Longitude, a site restriction of 5.0 kilometers west of Ashdown.

<sup>2/</sup> Channel 221C2 may be allotted to DeQueen, Arkansas at the present transmitter site for KDQN-FM at 34° 13' 35" North Latitude, 94° 17' 35" West Longitude.

The following changes are proposed to the FM Table of Allotments:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Ashdown, Arkansas	221A, 280A	227C3, 280A
DeQueen, Arkansas	226C2	221C2

Full compliance with all Commission spacing requirements for this proposal are shown in the attached Technical Exhibit prepared by Graham Brock, Inc., Broadcast Technical Consultants. Further, as noted in the Technical Exhibit, this proposal constitutes an incompatible channel swap, as KARQ(FM) proposes to swap its current operating channel with another authorized facility, creating a mutually exclusive relationship as contemplated in Section 1.420(g)(3) of the Commission's rules. As shown in the attached Technical Exhibit, each of the substitutions are mutually exclusive, which qualifies the proposal for an upgrade without consideration of competing proposals. See Modification of FM Broadcast Licenses to Higher Class Co-Channels or Adjacent Channels, 60 RR 2d 114, 120 (1986).

Since this proposal seeks the allotment of Channel 221C2 for KDQN-FM, in place of Channel 221A for KARQ(FM), a preclusion study demonstrating the impact of allotting Channel 221C2 to DeQueen, Arkansas on the availability of Class A, C3, C2, C1 and C non-commercial educational allotments on Channels 218, 219 and 220 is included in the Technical Exhibit. This preclusion study has been prepared in accord with First Report and Order, MM Docket No. 86-144, 52 Fed. Reg. 8259, published March 17, 1987

and Myrtle Beach, South Carolina, 3 FCC Rcd 7269 (1988). This preclusion study concludes that no new non-commercial services on Channels 218, 219 and 220 to communities with populations of 1,000 persons or more are precluded as the result of the proposed allotment of Channel 221C2 at DeQueen, Arkansas. Accordingly, there are no negative factors to be weighed as the result of precluded non-commercial allotments to communities against the public interest gains sought through this proposal.

As noted in the Technical Exhibit, the allotment of Channel 227C3 to KARQ(FM) will increase the population it serves to encompass 124,736 persons in 4,791 square kilometers (1990 Census data), representing an increase of 110,214 persons and 3,107 square kilometers over its presently licensed facilities.

Bunyard Partnership has a present intention to apply for Channel 227C3 at Ashdown, Arkansas if allotted, and when authorized, build the new facility promptly. Jay W. Bunyard and Anne W. Bunyard will, upon a substitution of Channel 221C2 for Channel 226C2 at DeQueen, Arkansas, file an application for the new channel, if allotted, and when authorized, build that facility promptly. Jay W. Bunyard and Anne W. Bunyard are principals in Bunyard Partnership.

WHEREFORE, for the reasons above, the commencement of a rule making proceeding looking toward the substitution of Channel 227C3 for Channel 221A at Ashdown, Arkansas, and the modification of the license of KARQ(FM) to specify operation on Channel 227C3; and the substitution of Channel 221C2 for Channel 226C2 at

DeQueen, Arkansas, and the specification of Channel 221C2 for  
KDQN-FM, is respectfully requested.

Respectfully submitted,

**BUNYARD PARTNERSHIP**  
**JAY W. BUNYARD AND ANNE W. BUNYARD**

By:   
John F. Garziglia  
Their Attorney

Pepper & Corazzini, L.L.P.  
1776 K Street, N.W.  
Suite 200  
Washington, D.C. 20006  
(202) 296-0600

January 15, 1997

# GRAHAM BROCK, INC.

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BROADCAST TECHNICAL CONSULTANTS

**PETITION FOR RULE MAKING  
BUNYARD PARTNERSHIP  
KARQ RADIO STATION  
ALLOT CHANNEL 227C3  
ASHDOWN, ARKANSAS  
January 1997**

**TECHNICAL EXHIBIT**

*Copyright 1997*

**PETITION FOR RULE MAKING  
BUNYARD PARTNERSHIP  
KARQ RADIO STATION  
ALLOT CHANNEL 227C3  
ASHDOWN, ARKANSAS  
January 1997**

**TECHNICAL STATEMENT**

1. This Technical Statement and attached exhibits were prepared on behalf of Bunyard Partnership ("BP"), licensee of station KARQ, Channel 221A, Ashdown, Arkansas. BP requests an amendment to the Commission's Table of FM Allotments, §73.202(b), by substituting Channel 227C3 for Channel 221A at Ashdown, Arkansas. Further, BP requests KARQ be ordered to change channels. In order to effectuate the upgrade at Ashdown, Arkansas, it is necessary to make an additional substitution. BP requests Channel 221C2 be substituted for Channel 226C2 at DeQueen, Arkansas., and KDQN-FM be ordered to change channels (the specific request is outlined in further detail below). The principals of BP, Jay W. Bunyard and Anne W. Bunyard, are the licensees of KDQN-FM. As such, the consent for the channel change at DeQueen is implied. This proposal constitutes an incompatible channel swap, since Channel 227C3 cannot be used at Ashdown, Arkansas, while Channel 226C2 is operating in DeQueen, Arkansas, nor can Channel 221C2 be utilized in DeQueen while Channel 221A is operating in Ashdown (see proposal section for more details).

**NON-COMMERCIAL PRECLUSION STUDY**

2. The proposed use of Channel 221C2 at De Queen, Arkansas, (from the below noted reference site) will cause the proposed 1.0 mV/m contour to overlap with the Grade B contour of station KTAL-TV, Channel 6, Texarkana, Texas. The KTAL-TV site is 149.1 kilometers at a bearing of 169.7° from the proposed Channel 221C2 reference site at DeQueen, Arkansas. BP

has, therefore, conducted a thorough non-commercial preclusion study, utilizing the requirements outlined in MM Docket #88-572, in order to determine if the proposed use of Channel 221C2 would preclude the institution of new non-commercial service on Channels 218, 219 and 220.

3. In conducting the preclusion study, a non-commercial preclusion radius (arc) was established to all existing or applied for non-commercial stations. This radius was determined by the greater of the sums of the protected and respective interfering contours of the proposed channel under study or the existing facility.<sup>1</sup> Where a commercial allotment or licensed or applied for facility is under consideration, the required spacing distance under §73.207 was used.

#### **CHANNEL 218 REVIEW**

4. All classes of stations on Channel 218 are currently precluded due to the protection radius to KTXK, Channel 218A, Texarkana, Texas; KALR, Channel 218C3, Hot Springs, Arkansas; and KARG, Channel 219C2, Poteau, Oklahoma. Exhibit #1 shows the typical preclusion of Channel 218A. Due to the increase protection arcs of the facilities shown on Exhibit #1, Channels 218C3, 218C2, 218C1 and 218C are likewise precluded by KTXK, KALR and KARG.

#### **CHANNEL 219 REVIEW**

5. The potential for non-commercial preclusions on Channel 219 is different from those for Channel 218. Specifically, there is the potential for some preclusions to Channel 219A by the allotment of Channel 221C2 at DeQueen, Arkansas. The preclusion area is within the proposed Channel 221C2 arc and the arcs to KTXK, KALR and KARG. A study was made to

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1) The actual licensed or applied for facilities for the existing stations were used. Maximum contour distances were used for the channel and class under study.



determine if any towns or communities of 1,000 persons were located within the preclusion area.<sup>2</sup> Exhibit #2 shows the Channel 291A precluded area. Within the area, one town was identified, Nashville (Howard County), Arkansas, with a population of 4,639. However, it is feasible to site restrict Channel 219A 4.8 kilometers east of the community to avoid shortspacing KDQN-FM on Channel 221C2. As such, Channel 219A is not actually precluded by this proposal.<sup>3</sup> The increase protection arcs for higher class stations on Channel 219 from KARG and KTXK are the precluding factor for Channels 219C3, 219C2, 219C1 and 219C. The typical increased preclusion for Channel 219C3 is shown on Exhibit #3.<sup>4</sup>

### **CHANNEL 220 REVIEW**

6. There is a greater potential for non-commercial preclusions on Channel 220 than the previous two channels. In the case of Class A and C3 facilities on Channel 220, there are areas which potentially are precluded by the proposed use of Channel 221C2 at DeQueen, Arkansas. This area is bounded by KARQ (Channel 221A), the proposed Channel 221C2 and other adjacent channels non-commercial facilities, as detailed on Exhibits #4, #5 and #6.<sup>5</sup> A study was made to determine if any towns or groupings of persons of 1,000 or more were situated in the preclusion area.<sup>6</sup> On Exhibits #4 and #5 the area of preclusion is denoted. Channel 220C2, Channel 220C1 and Channel 220C are precluded by other existing or proposed non-commercial facilities and are not excluded by KARQ or the proposed Channel 221C2 allotment (see Exhibit #6).

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2) In determining the towns or groupings within the preclusion area, the towns were identified and then referenced to the 1990 Census for the states of Arkansas, Texas and Oklahoma. If the community had less than 1,000 persons or was not listed, the town (or groupings) was not considered.

3) The impact of Channel 6 was not studied since the impact to the channel and the slight site restriction would not change the location/depth of potential Channel 6 interference.

4) The protection arcs for KARG and KTXK completely encompass the preclusionary are of the existing KARQ and proposed C2 facility at DeQueen, Arkansas.

5) Contour or spacing arcs used as appropriate to commercial and non-commercial facilities.

6) See Footnote 2, *supra*.

7. Within the Channel 220A preclusion area (Exhibit #4) there was one town of 1000 or more, Glenwood (Pike County) Arkansas with a population of 1,354.<sup>7</sup> While this community is in the preclusion area, it is feasible that Channel 215A could be located in the community and meet the necessary spacing and protection from interference requirements of the Commission's rules.<sup>8</sup> In the Channel 220C3 preclusion area (Exhibit #5), there were no communities identified.<sup>9</sup> The Channel 220C2 preclusion area (Exhibit #6) shows the proposed Channel 221C2 allotment and KARQ are not preclusionary factors for Channel 220C2, because of the increase arcs from other non-commercial facilities. The further increased arcs from the non-commercial facilities likewise preclude Channel 220C1 or Channel 220C.<sup>10</sup>

### **PRECLUSION SUMMARY**

8. As has been shown, all classes of stations on Channel 218 are not precluded by the proposed use of Channel 221C2 at DeQueen, Arkansas. Channel 219 A is precluded from operation only in the identified community, but could be restricted a distance of 4.8 kilometers and no longer be impacted by Channel 221C2. The remaining classes of stations on Channel 219 are precluded by other non-commercial facilities and not by the Channel 221C2 allotment. Channel 220A has an area of preclusion, due to Channel 221C2, but an alternate Class A non-commercial facility, if available, would allow service to the community. In the Channel 220C3 preclusion area there are no communities with populations of more than 1,000 persons. All other classes of stations on Channel 220 are precluded by other non-commercial facility and not by the

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- 7) In McCurran County, Oklahoma, the community of Wright City (836 persons) and Valliant (873 persons) were identified in the Channel 219A precluded area. While these communities fall below the 1,000 person threshold, they were initially considered for preclusionary purposes since they were close to the threshold population. Channel 218A could be utilized in either community with a 14.0 kilometer site restriction with maximum 6.0 kilowatt 100 meter HAAT facilities and not impact KTAL. Channel 6.
- 8) A preliminary Channel 6 interference analysis indicated a 400 watt at 100 meters HAAT facility could be located in Glenwood and not interfere with the KTAL Grade B contour.
- 9) See Footnote #2. supra.
- 10) The protection arcs for KARG; AP220, McAlester, Oklahoma; AP220, Jefferson, Texas; KXRJ; and AP220, El Dorado, Arkansas, completely encompass KARQ and the proposed Channel 221C2. Therefore, no additional preclusionary maps above Channel 220C2 are attached.

Channel 221C2 allotment. Therefore, this proposal doesn't preclude new non-commercial service to the communities identified with populations of 1,000 persons or more because of the site restrictions of the impacted channel or the availability of alternate channels.

## **PROPOSAL**

9. Substitution of Channel 227C3 for Channel 221A at Ashdown, Arkansas, is proposed under the Commission's incompatible channel swap provisions. Specifically, in order for Channel 227C3 to be allotted in substitution of Channel 221A at Ashdown, it is necessary for Channel 221C2 to be substituted for Channel 226C2 at DeQueen, Arkansas. The availability of Channel 227C3 at Ashdown is only possible after station KDQN-FM is no longer operating on Channel 226C2 and KDQN-FM cannot move to Channel 221C2 as long as KARQ remains licensed on Channel 221A. There are no other C2 channels which meet the Commission's minimum distance separation requirements at the KDQN-FM authorized transmitter site aside from Channel 221. Therefore, this proposal complies with the Commission's incompatible channel swap regulations and no competing expressions in the improved Channel 227C3 at Ashdown should be solicited by the Commission.

10. Therefore, Channel 227C3 can be substituted for Channel 221A at Ashdown, Arkansas, at coordinates North Latitude 33° 40' 22" and West Longitude 94° 11' 02". This represents a site restriction 5.0 kilometers west of the community to avoid shortspacing KISQ, Channel 227C3, El Dorado, Arkansas. From this location, a 3.16 mV/m contour will be delivered to Ashdown. Exhibit #7 is a usable area study for Channel 227C3 at Ashdown, Arkansas. Exhibit #8 is a spacing study for the channel and demonstrates that under §73.207 of the Commission's rules the channel is clear to all licensed, applied for or proposed facilities, with the exception of KDQN-FM as detailed below.

11. Channel 221C2 can be substituted for Channel 226C2 at DeQueen, Arkansas, (provided Channel 227C3 is substituted for Channel 221A at Ashdown, Arkansas), at coordinates North Latitude 34° 13' 35" and West Longitude 94° 17' 35". This is the present KDQN-FM authorized transmitter site.<sup>11</sup> From this location , a 3.16 mV/m contour will continue to be delivered to De Queen. Exhibit #9 is a spacing study for the channel and demonstrates that under §73.207 of the Commission's rules, the channel is clear to all licensed, applied for or proposed facilities with the exception of Channel 221A at Ashdown, Arkansas (which is to move to Channel 227C3 as part of this proposal).

14. Therefore, BP proposes the following change to the Commission's Table of FM Allotments:

**Ashdown, Arkansas**

Present	Proposed
221A, 280A	227C3, 280A

**DeQueen, Arkansas**

Present	Proposed
226C2	221C2

**PUBLIC INTEREST ASPECTS**

15. The allocation of Channel 227C3 will enable KARQ to increase its population and service areas to encompass 124,736 persons in 4,791.1 square kilometers (within the 1.0 mV/m

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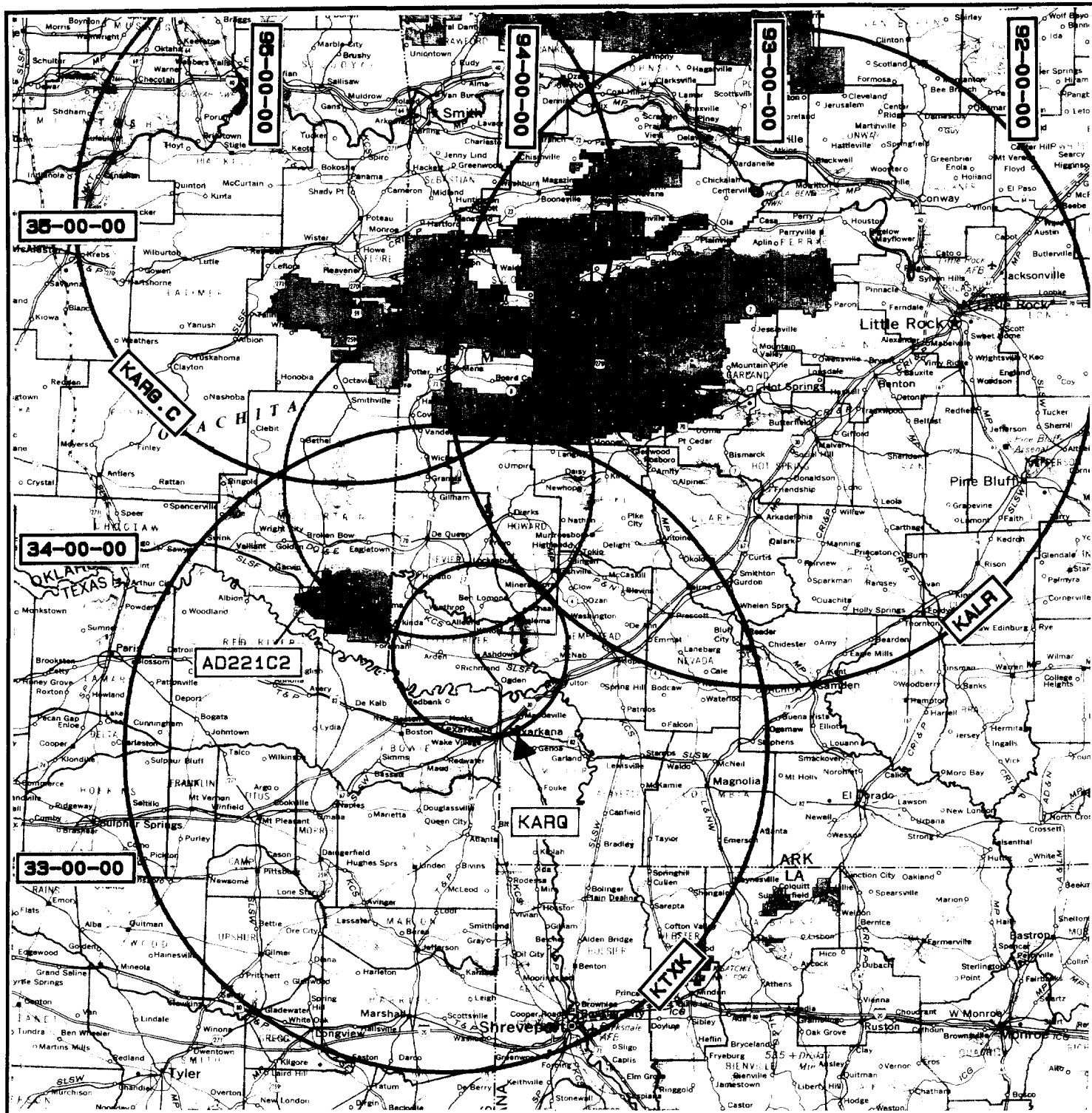
<sup>11)</sup> This is the site specified in BPH-950620FF at which KDQN-FM is presently operating under automatic program test.

contour).<sup>12</sup> This represents an increase of 110, 214 persons and 3,107.0 square kilometers over its present licensed facilities. When Channel 227C3 is allotted to Ashdown, Arkansas. BP will file an application to make minor changes in the facilities of KARQ. Further, BP will relocate KDQN-FM to Channel 221C2.

18. The foregoing Technical Statement and attached exhibits were prepared on behalf of Bunyard Partnership by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. Should questions arise during consideration of these requests, we welcome the opportunity to discuss the matter by phone at 912-638-8028. All data relating to FM facilities was extracted from the NTIA database, as updated on December 27, 1996. We assume no liability for errors or omissions in that database which may be adverse to the requests contained herein.

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12) 1990 Census data.

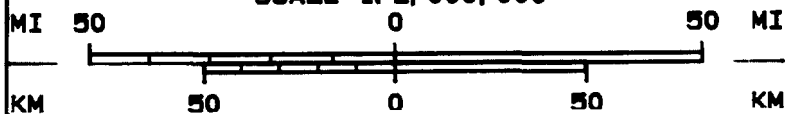


# CHANNEL 218A PRECLUSION MAP

MAP IS A PORTION OF THE 1: 2, 000, 000 SCALE  
U.S.G.S. NATIONAL ATLAS MAP - SOUTHERN  
MISSISSIPPI VALLEY (SHEET #14-15) .

EXHIBIT #1A IS STATION TABULATION OF  
FACILITIES SHOWN ON MAP.

SCALE 1: 2, 000, 000



## EXHIBIT #1

PETITION FOR RULE MAKING  
BUNYARD PARTNERSHIP  
KARG RADIO STATION  
ALLOT CHANNEL 227C3  
ASHDOWN, ARKANSAS

January 1997

**GRAHAM BROCK, INC.**

BROADCAST TECHNICAL CONSULTANTS

**PETITION FOR RULE MAKING  
BUNYARD PARTNERSHIP  
KARQ RADIO STATION  
ALLOT CHANNEL 227C3  
ASHDOWN, ARKANSAS  
January 1997**

**EXHIBIT #1A**

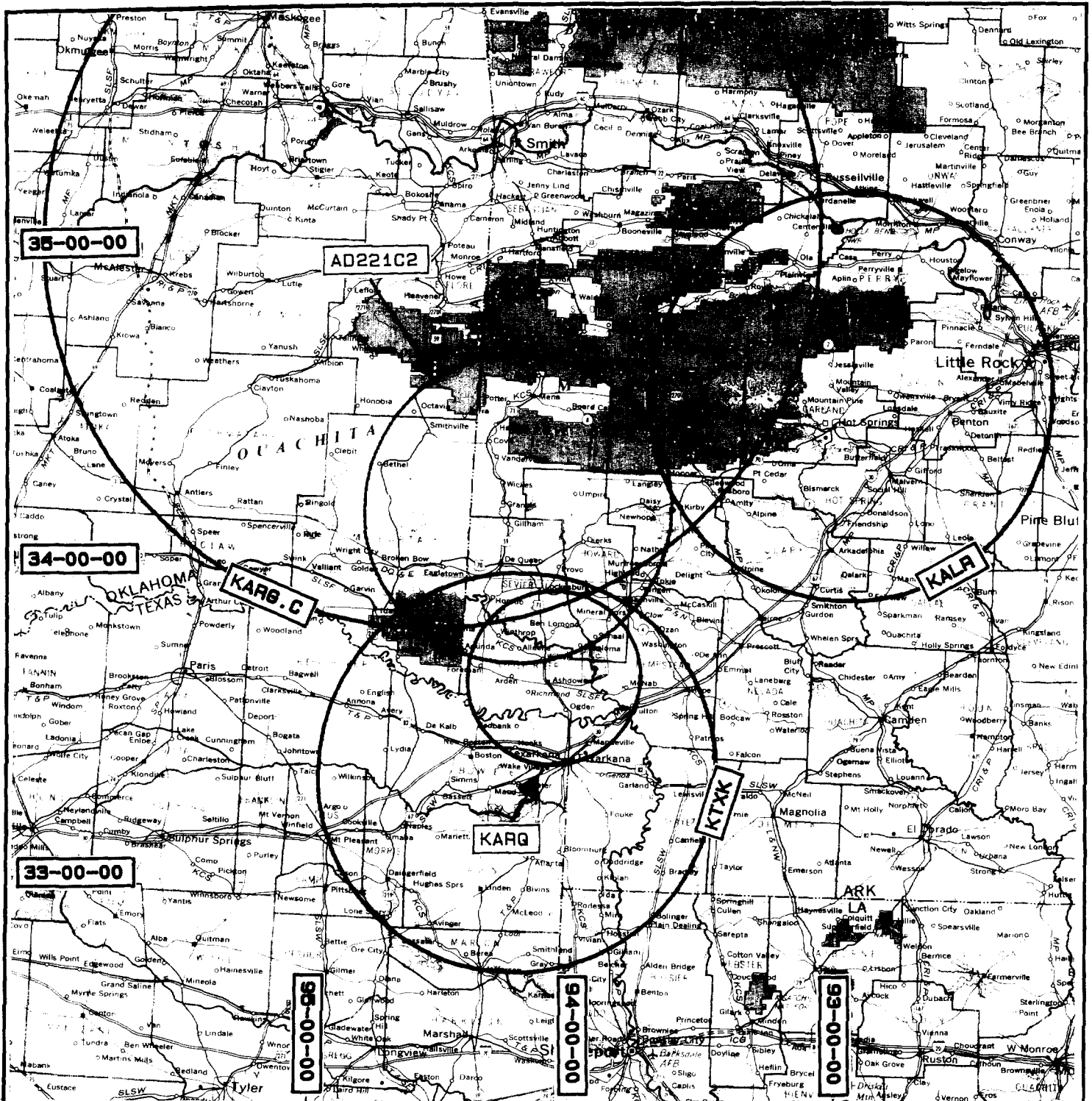
**Stations Considered in Preclusion Study  
Channel 218A**

AD221C2, DeQueen, Arkansas/KARQ, Channel 221A, Ashdown, Arkansas  
(Subject station/Proponent)

KTXK Channel 218A Texarkana, TX  
5.2 kilowatts - 102 meters HAAT  
Preclusionary arc 114.3 kilometers

KALR Channel 218C3 Hot Springs, AR  
3.0 kilowatts - 148 meters HAAT  
Preclusionary arc 115.4 kilometers

KARG Channel 219C2 Poteau, OK  
2.5 kilowatts - 569 meters HAAT  
Preclusionary arc 96.0 kilometers



### CHANNEL 219A PRECLUSION MAP

MAP IS A PORTION OF THE 1: 2, 000, 000 SCALE  
U.S.G.S. NATIONAL ATLAS MAP - SOUTHERN  
MISSISSIPPI VALLEY (SHEET #14-15) .

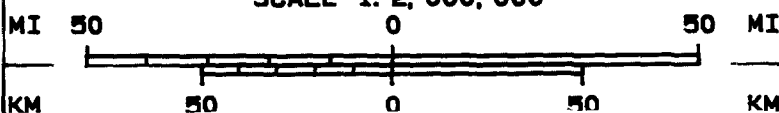
EXHIBIT #2A IS STATION TABULATION OF  
FACILITIES SHOWN ON MAP.

### EXHIBIT #2

PETITION FOR RULE MAKING  
BUNYARD PARTNERSHIP  
KARG RADIO STATION  
ALLOT CHANNEL 227C3  
ASHDOWN, ARKANSAS

January 1997

SCALE 1: 2, 000, 000



# GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS



**PETITION FOR RULE MAKING  
BUNYARD PARTNERSHIP  
KARQ RADIO STATION  
ALLOT CHANNEL 227C3  
ASHDOWN, ARKANSAS  
January 1997**

**EXHIBIT #2A**

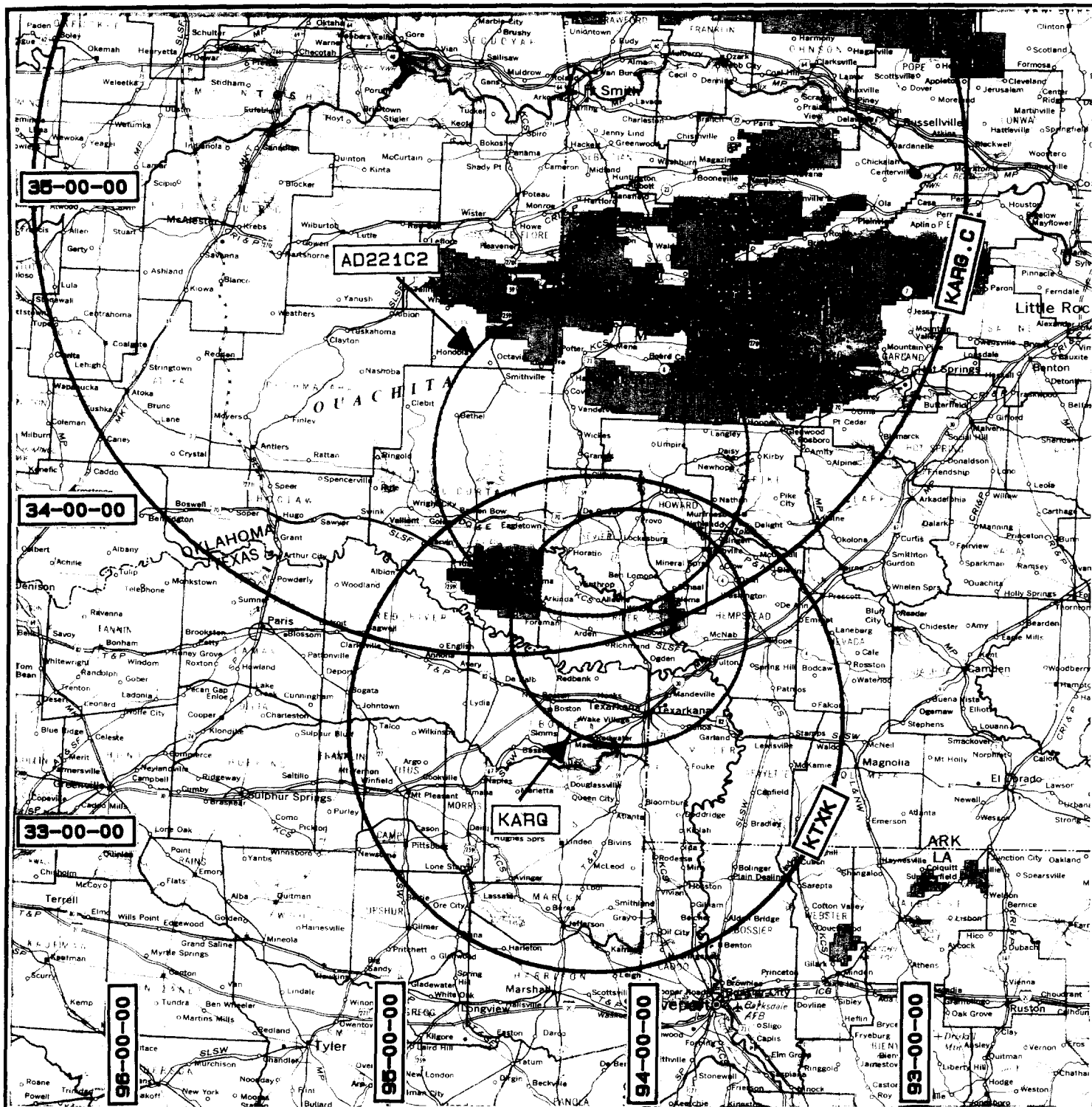
**Stations Considered in Preclusion Study  
Channel 219A**

AD221C2, DeQueen, Arkansas/KARQ, Channel 221A, Ashdown, Arkansas  
(Subject station/Proponent)

KARG Channel 219C2 Poteau, OK  
2.5 kilowatts - 569 meters HAAT  
Preclusionary arc 139.0 kilometers

KTXK Channel 218A Texarkana, TX  
5.2 kilowatts - 102 meters HAAT  
Preclusionary arc 71.3 kilometers

KALR Channel 218C3 Hot Springs, AR  
3.0 kilowatts - 148 meters HAAT  
Preclusionary arc 72.4 kilometers



### CHANNEL 219C3 PRECLUSION MAP

MAP IS A PORTION OF THE 1: 2, 000, 000 SCALE  
U.S.G.S. NATIONAL ATLAS MAP - SOUTHERN  
MISSISSIPPI VALLEY (SHEET #14-15) .

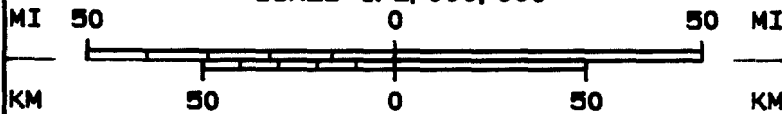
EXHIBIT #3A IS STATION TABULATION OF  
FACILITIES SHOWN ON MAP.

### EXHIBIT #3

PETITION FOR RULE MAKING  
BUNYARD PARTNERSHIP  
KARG RADIO STATION  
ALLOT CHANNEL 227C3  
ASHDOWN, ARKANSAS

January 1997

SCALE 1: 2, 000, 000



# GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

**PETITION FOR RULE MAKING  
BUNYARD PARTNERSHIP  
KARQ RADIO STATION  
ALLOT CHANNEL 227C3  
ASHDOWN, ARKANSAS  
January 1997**

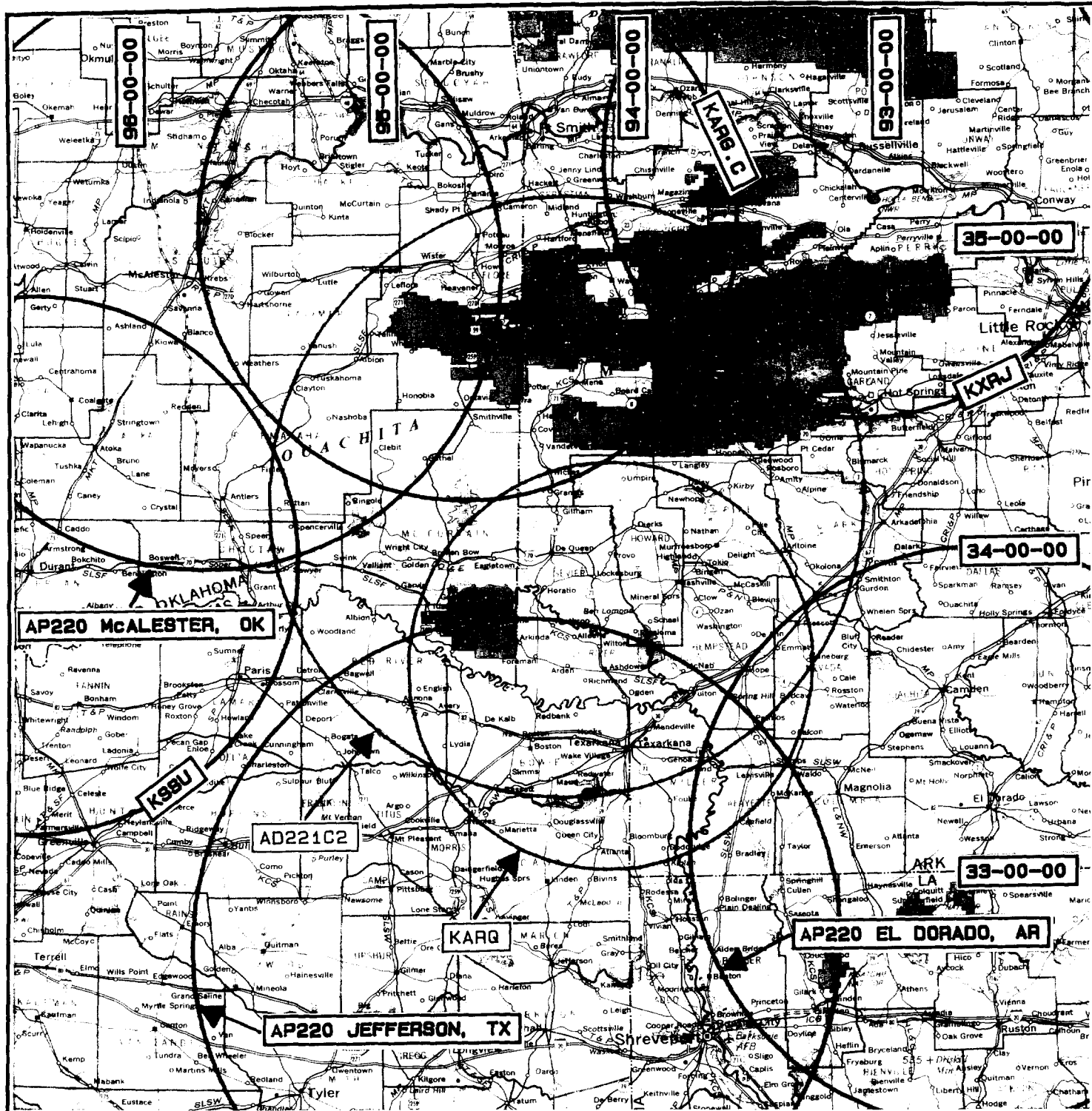
**EXHIBIT #3A**

**Stations Considered in Preclusion Study  
Channel 219C3**

AD221C2, DeQueen, Arkansas/KARQ, Channel 221A, Ashdown, Arkansas  
(Subject station/Proponent)

KARG Channel 219C2 Poteau, OK  
2.5 kilowatts - 569 meters HAAT  
Preclusionary arc 165.8 kilometers

KTXK Channel 218A Texarkana, TX  
5.2 kilowatts - 102 meters HAAT  
Preclusionary arc 87.8 kilometers

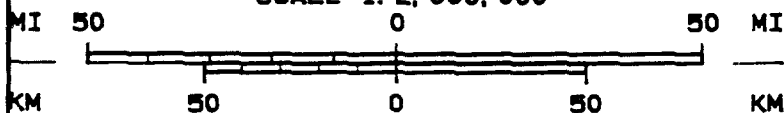


# CHANNEL 220A PRECLUSION MAP

MAP IS A PORTION OF THE 1: 2, 000, 000 SCALE U.S.G.S. NATIONAL ATLAS MAP - SOUTHERN MISSISSIPPI VALLEY (SHEET #14-15) .

EXHIBIT #4A IS STATION TABULATION OF FACILITIES SHOWN ON MAP.

SCALE 1: 2, 000, 000



## EXHIBIT #4

PETITION FOR RULE MAKING  
BUNYARD PARTNERSHIP  
KARG RADIO STATION  
ALLOT CHANNEL 227C3  
ASHDOWN, ARKANSAS

January 1997

**GRAHAM BROCK, INC.**

BROADCAST TECHNICAL CONSULTANTS

**PETITION FOR RULE MAKING  
BUNYARD PARTNERSHIP  
KARQ RADIO STATION  
ALLOT CHANNEL 227C3  
ASHDOWN, ARKANSAS  
January 1997**

**EXHIBIT #4A**

**Stations Considered in Preclusion Study  
Channel 220A**

AD221C2, DeQueen, Arkansas/KARQ, Channel 221A, Ashdown, Arkansas  
(Subject station/Proponent)

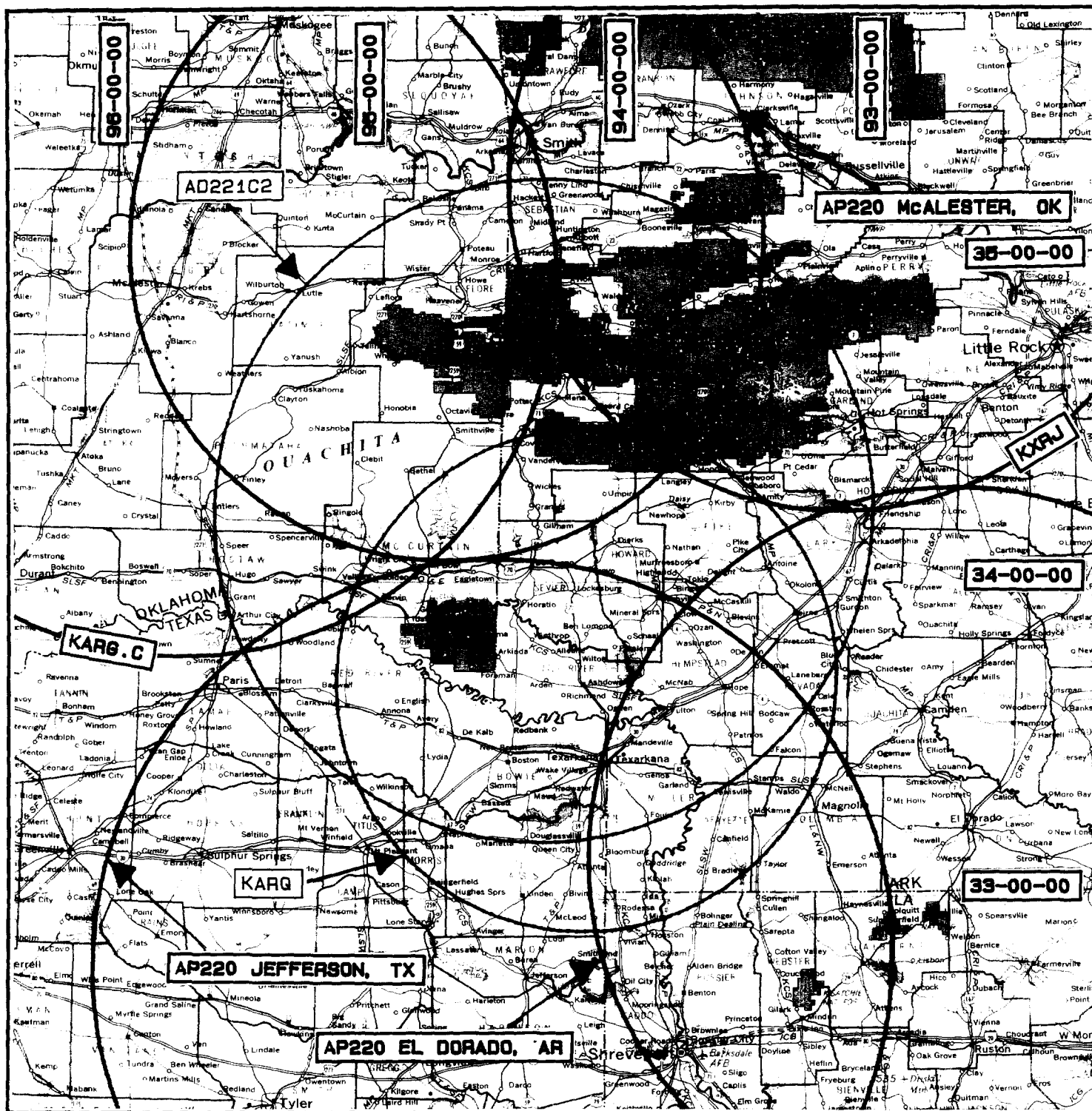
KARG Channel 219C2 Poteau, OK  
2.5 kilowatts - 569 meters HAAT  
Preclusionary arc 96.0 kilometers

AD220 Channel 220A McAlester, OK  
1.95 kilowatts - 75 meters HAAT  
Preclusionary arc 105.2 kilometers

AP220 Channel 220A Jefferson, TX  
3.1 kilowatts - 141 meters HAAT  
Preclusionary arc 115.2 kilometers

AP220 Channel 220A El Dorado, AR  
1.0 kilowatts - 71 meters HAAT  
Preclusionary arc 102.1 kilometers

KSSU Channel 220A Durant, OK  
0.32 kilowatts - 41 meters HAAT  
Preclusionary arc 95.5 kilometers

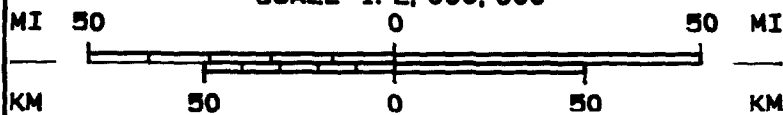


# CHANNEL 220C3 PRECLUSION MAP

MAP IS A PORTION OF THE 1: 2, 000, 000 SCALE U.S.G.S. NATIONAL ATLAS MAP - SOUTHERN MISSISSIPPI VALLEY (SHEET #14-15) .

EXHIBIT #5A IS STATION TABULATION OF FACILITIES SHOWN ON MAP.

SCALE 1: 2, 000, 000



## EXHIBIT #5

PETITION FOR RULE MAKING  
BUNYARD PARTNERSHIP  
KARG RADIO STATION  
ALLOT CHANNEL 227C3  
ASHDOWN, ARKANSAS

January 1997

**GRAHAM BROCK, INC.**

BROADCAST TECHNICAL CONSULTANTS

**PETITION FOR RULE MAKING  
BUNYARD PARTNERSHIP  
KARQ RADIO STATION  
ALLOT CHANNEL 227C3  
ASHDOWN, ARKANSAS  
January 1997**

**EXHIBIT #5A**

**Stations Considered in Preclusion Study  
Channel 220C3**

AD221C2, DeQueen, Arkansas/KARQ, Channel 221A, Ashdown, Arkansas  
(Subject station/Proponent)

KARG Channel 219C2 Poteau, OK  
2.5 kilowatts - 569 meters HAAT  
Preclusionary arc 112.5 kilometers

AD220 Channel 220A McAlester, OK  
1.95 kilowatts - 75 meters HAAT  
Preclusionary arc 132.1 kilometers

AP220 Channel 220A Jefferson, TX  
3.1 kilowatts - 141 meters HAAT  
Preclusionary arc 142.1 kilometers

KXRJ Channel 220A Russellville, AR  
0.10 kilowatts - 28 meters HAAT  
Preclusionary arc 119.2 kilometers

AP220 Channel 220A El Dorado, AR  
1.0 kilowatts - 71 meters HAAT  
Preclusionary arc 129.0 kilometers





**PETITION FOR RULE MAKING  
BUNYARD PARTNERSHIP  
KARQ RADIO STATION  
ALLOT CHANNEL 227C3  
ASHDOWN, ARKANSAS  
January 1997**

**EXHIBIT #6A**

**Stations Considered in Preclusion Study  
Channel 220C2**

AD221C2, DeQueen, Arkansas/KARQ, Channel 221A, Ashdown, Arkansas  
(Subject station/Proponent)

KARG Channel 219C2 Poteau, OK  
2.5 kilowatts - 569 meters HAAT  
Preclusionary arc 130.4 kilometers

AD220 Channel 220A McAlester, OK  
1.95 kilowatts - 75 meters HAAT  
Preclusionary arc 156.4 kilometers

AP220 Channel 220A Jefferson, TX  
3.1 kilowatts - 141 meters HAAT  
Preclusionary arc 166.4 kilometers

KXRJ Channel 220A Russellville, AR  
0.10 kilowatts - -28 meters HAAT  
Preclusionary arc 143.5 kilometers

AP220 Channel 220A El Dorado, AR  
1.0 kilowatts - 71 meters HAAT  
Preclusionary arc 153.3 kilometers